

1 MARK D. LONERGAN (State Bar No. 143622)
mdl@severson.com
2 ELENA K. KOUVABINA (State Bar No. 235918)
ekk@severson.com
3 SEVERSON & WERSON
A Professional Corporation
4 One Embarcadero Center, Suite 2600
San Francisco, California 94111
5 Telephone: (415) 398-3344
Facsimile: (415) 956-0439
6
7 Attorneys for Defendant
WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

12 STANLEY D. CANNON and
13 PATRICIA R. CANNON,
individually and for all other persons
similarly situated.

Plaintiffs

vs.

16
17 WELLS FARGO BANK, N.A., FEDERAL
NATIONAL MORTGAGE ASSOCIATION,
and ASSURANT, INC.

Defendant

Case No.: 3:12-cv-01376-EMC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANT WELLS FARGO BANK,
N.A., TO RESPOND TO FIRST
AMENDED CLASS ACTION
COMPLAINT**

Judge: The Hon. Edward M. Chen

Action Filed: March 19, 2012
Trial Date: None Set

STIPULATION

Pursuant to Local Rules 6-1(b) and 6-2, Plaintiffs and Defendant Wells Fargo Bank, N.A., (“Wells Fargo”) by and through their respective counsel, hereby stipulate and request the Court’s Order that Wells Fargo shall have until **September 14, 2012** to file a response to Plaintiff’s First Amended Complaint (“FAC”).

In support of this stipulation, the parties state the following:

1. On July 23, 2012, Plaintiffs filed a FAC.
 2. Wells Fargo's response to Plaintiffs' FAC is currently due on August 20, 2012, by
tion.

10 3. The parties hereby stipulate and request that the Court extend the time for the filing
11 of Wells Fargo's response to Plaintiffs' FAC until **September 14, 2012**.

12 4. In support of this stipulation and request, the parties state that Plaintiffs, Wells
13 Fargo and defendant Assurant, Inc., are currently in discussions concerning a joint briefing
14 schedule, and that September 14, 2012 will make Wells Fargo's response to the FAC due on the
15 same day as Defendant Assurant, Inc.'s. Previous schedule modifications were made in the case
16 extending the time for Wells Fargo to respond to Plaintiffs' initial Complaint and the FAC and for
17 Plaintiffs to oppose Wells Fargo's motion to dismiss the Complaint. The stipulated request will
18 result in only a minor delay to the case schedule.

19 **WHEREFORE**, the parties stipulate and respectfully request the Court that the time for
20 Wells Fargo to respond to Plaintiffs' FAC be extended until **September 14, 2012**.

IT IS SO STIPULATED.

1 DATED: August 20, 2012

SEVERSON & WERSON
A Professional Corporation

3
4 By: /s/ Elena Kouvabina
5 Elena K. Kouvabina

6 Attorneys for Defendant
7 WELL'S FARGO BANK, N.A.

8 DATED: August 20, 2012

9 CARTER WALKER, PLLC

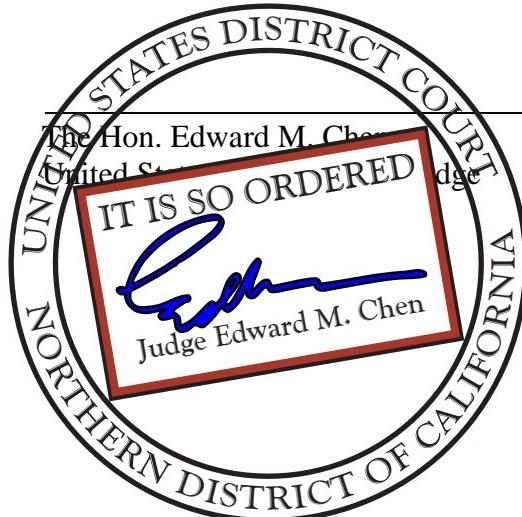
10 By: /s/ T. Brent Walker
11 T. Brent Walker

12 Attorneys for Plaintiffs
13 STANLEY D. CANNON AND PATRICIA R.
14 CANNON

15 [PROPOSED] ORDER

16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17 Dated: 8/21/12



ECF CERTIFICATION

I, Elena Kouvabina, am the ECF User whose identification and password are being used to file this Stipulation and Proposed Order to Extend Time for Wells Fargo to Respond to Plaintiffs' FAC. I hereby attest that counsel for Plaintiffs, T. Brent Walker, concurred in this filing.